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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

THOMAS H. COULD
CLERK, U.S. DISTRICT COURT
AND OF TN, MEMPHIS

Michael Angelo Taylor
4401 English Pear CV
Memphis TN 38128

(Name of plaintiff or plaintiffs)

v.

CIVIL ACTION NO. _____

Leslie Pool Mart
3925 E. Broadway Blk 106
Phoenix, AZ 85040-2916

(Name of defendant or defendants)

COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 U.S.C. §2000e-5(g).

2. Plaintiff, Michael A. Taylor
(name of plaintiff)

is a citizen of the United States and resides at 4401 English Pear CV
(street address)

Memphis
(city)

SHELBY
(country)

TN
(state)

38128
(zip code)

901 382-7586
(telephone number)

3. Defendant Leslie Popl Mart
(defendant's name)

lives at, or its business is located at 3925 E Broadway Rd Ste 100
(street address)

4. Plaintiff sought employment from the defendant or was employed by the defendant at

Phoenix (street address)
(city) (country) (state) (zip code) 85040-2976

5. Defendant discriminated against plaintiff in the manner indicated in paragraph 9 of this complaint on or about 03 06 2011

(day) (month) (year)

6. Defendant filed charges against the defendant with the Tennessee Fair Employment Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about 08 04 2011

(day) (month) (year)

7. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about 08 04 2011

(day) (month) (year)

8. The Equal Employment Opportunity Commission issued a Notice of Right to Sue, which was received by plaintiff on 13 12 2011. (Attach a copy of the notice to this complaint.)

9. Because of plaintiff's (1) Y race, (2) X color, (3) sex, (4) religion, (5) national origin, defendant

(a) failed to employ plaintiff.

(b) X terminated plaintiff's employment.

(c) failed to promote plaintiff.

(d)

10. The circumstances under which defendant discriminated against plaintiff were as follows:

See attached EEOC file

11. The acts set forth in paragraph 9 of this complaint

- (a) are still being committed by defendant.
- (b) are no longer being committed by defendant.
- (c) may still be being committed by defendant.

12. Please attach to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission, which are submitted as a brief statement of the facts supporting this complaint.

WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:

- (a) Defendant be directed to employ plaintiff, or
- (b) Defendant be directed to re-employ plaintiff, or
- (c) Defendant be directed to promote plaintiff, or;
- (d) Defendant be directed to _____

and that the Court grant such other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

13. I would like to have my case tried by a jury. Yes No



SIGNATURE OF PLAINTIFF